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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BEVERLY J. WATKINS, an individual,

Plaintiff,

vs.

UNIVERSITY MEDICAL CENTER a.k.a
UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA a.k.a. UMC, a
political subdivision of Nevada; DOES I-V;
ROES VI-X,

Defendants.

CASE NO: 2:16-cv-01105-APG-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO THE
COMPLAINT
(First Request)**

The parties hereto, by and through their respective undersigned counsel of record, hereby stipulate, agree, and make joint application to extend the date for Defendant's response to the complaint, to July 8, 2016, from the present due date of June 8, 2016. This extension is needed because the Summons and Complaint, served on the Clark County Board of Commissioners on May 18, 2016, was initially forwarded to County District Attorney's Office, which did not send the matter to UMC until May 24, 2016. The undersigned counsel for Defendant did not receive notice of the case until late on Thursday, May 26, 2016, just prior to the Memorial Day weekend. As well, it appears that a number of persons prominently mentioned in the Complaint were, but no longer are employed by UMC. Finally, the undersigned counsel for Defendant will be in Indiana for previously schedule depositions the entire week of June 13, and is scheduled for a

1 role in the presentations at the State Bar Convention and will be in Hawaii for the week of June
2 27.

3 DATED this ____TH day of June, 2016.

DATED this ____TH day of June, 2016.

4 Law Office of Dan M. Winder, P.C.

Morris, Sullivan, Lemkul & Pitegoff

5
6 /s/ Dan Winder, Esq.

/s/ Jeffrey I. Pitegoff, Esq.

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Attorney for Defendant

18 Attorneys for Plaintiff

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21 **ORDER**

22 IT IS SO ORDERED. The date for Defendant's response to the Complaint is extended to July 8,
23 2016.

24 
25 UNITED STATES MAGISTRATE JUDGE

26 Dated: June 8, 2016

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that on this 7th day of June, 2016, I served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO THE COMPLAINT** on all parties in this action by Electronic Mail through the United States District Court's CM/ECF Filing System.

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/s/ Allyson Lodwick
An Employee of MORRIS, SULLIVAN, LEMKUL & PITEGOFF